

**Federal Defenders
OF NEW YORK, INC.**

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June 2, 2020

VIA ECF

The Honorable Judge J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: United States v. Daurell Chavis
20 Cr. 192 (JPO)**

Honorable Judge Oetken:

I write on behalf of my client, Daurell Chavis, to respectfully request that the Court modify Mr. Chavis's bail conditions from home detention to curfew. This is Mr. Chavis's second bail modification request. The Government and Pretrial Services consent to this request.

On February 11, Magistrate Judge Robert W. Lehrburger released Mr. Chavis on his own signature and imposed the following bail conditions: a \$50,000 personal recognizance bond, cosigned by two financially responsible persons; travel restricted to SDNY/EDNY; surrender of all travel documents and no new applications; pretrial supervision as directed by Pretrial Services; urinalysis; home detention with GPS monitoring; surrender of all weapons and firearms; and no contact with co-defendants unless in the presence of counsel. Mr. Chavis's bail conditions were timely satisfied.

On February 21, before Magistrate Judge Sarah Cave, the defense requested that Mr. Chavis's bail conditions be modified to remove home detention and electronic monitoring. Magistrate Judge Cave denied this request.

Since February, Mr. Chavis has relocated to a new home. He is the primary caretaker and single parent of his two young daughters, who have moved in with him. In addition, Mr. Chavis continues to receive dialysis treatment, which requires him to travel to a medical facility three days a week. Home detention is not well suited for these obligations, which require more flexibility in movement. Since his release nearly four months ago, Mr. Chavis has been compliant with his bail conditions and has reported to Pretrial Services as directed.

Accordingly, the defense requests a bail modification from home detention to curfew as directed by Pretrial Services, enforced by GPS monitoring. The Government consents to this request.

Thank you for your consideration of this matter.

Granted. Defendant's condition of home detention with GPS monitoring is hereby removed and replaced with the condition of curfew as directed by Pretrial Services with GPS monitoring.

June 3, 2020

SO ORDERED:

Respectfully submitted,

/s/

Marne L. Lenox
Assistant Federal Defender
(212) 417-8721



J. PAUL OETKEN
United States District Judge

cc: Ni Qian, Assistant U.S. Attorney (via ECF)
Sheb Swett, Assistant U.S. Attorney (via ECF)
Joshua Rothman, Intensive Supervision Specialist (via E-mail)